

EXHIBIT 15



US Department of Labor -- OSHA
Statement

I, Frank Buono, reside at
131 Hill Road in the
(Number) (Street)
city of Goshen, County of Orange,
State of NY, Zip Code 10924.

My telephone number is (845) 978-8667

I have been employed by Oprandy's Fire and Safety Inc.

Located at 49 Brookline Avenue Middletown NY 10940
(Number) (Street) (City) (State) (Zip Code)

Business phone () .

My job classification is/was service technician.

I understand that this statement will be held in confidence until such time as I may be called to testify in a court proceeding, at which time it may be produced upon demand of opposing counsel. Additionally, this statement may be made available to other agencies if it will assist them in the performance of their statutory functions. Upon the closing of this case, this statement may be subject to disclosure only in accordance with applicable statute(s) and agency policy.

I hereby depose and say:

It's April 18, 2016 at approximately 2:00 PM and myself and attorney Kevin Fitzpatrick are speaking to OSHA compliance officer Andrew Reed by phone. I understand that this interview is being recorded.

I worked for Oprandy for a month and a couple days prior to the date of the accident on February 12, 2016. My job was to clean and maintain fire extinguishers. I worked in the shop with Chris Faust. I would discharge the contents then take the fire extinguishers apart and refill them with dry chemical powder and CO2. I mostly worked on dry chemical extinguishers. Most of my training was on-the-job from Chris. He showed me how to take the units apart and put them back together. I also cleaned the shop. I didn't really have any safety training for hazards in the shop. I don't have any specialized training or certifications to service fire extinguishers or fill compressed gas cylinders. I did

not receive any specific safety training from Chris or Brian Scott while I worked there. I would sometimes wear gloves to protect my hands.

We would repressurize fire extinguishers by hooking them to the CO2 line, opening the valve, and watching the gauge on the extinguisher to see when it was full. To avoid overpressurizing, I would make sure not to hold the valve open too long. If something wasn't working right, I would ask Chris. Watching the gauge was the normal way of doing it. I would service 16 to 35 fire extinguishers every day. These were dry chem ABC units. I didn't work on wet chemical units. Although I know some of the chemicals that go into the extinguishers, I was not provided with any training on the hazards or health effects of the chemicals I work with. Other than gloves, I didn't wear any safety equipment while servicing fire extinguishers. Chris and I were the only ones who worked in the shop – everyone else worked in the field.

I haven't done any extinguisher testing. Chris did that. I watched Chris do proof-pressure tests and he showed me how to do it. I have never seen a safety cage used. They didn't have a cage in the shop or in the back room where the explosion happened. I don't know how often Chris did proof-pressure testing but it wasn't done on every fire extinguisher. I don't know if it even has to be done on every extinguisher. There's so many different types of extinguishers and I'm not sure what type are supposed to get what type of testing.

I haven't filled test cylinders before. The day of the accident was the first time they were showing me how to do it. I saw Chris fill one about two weeks prior to the accident. The air cylinder filling is totally different. ^{FB}Chris grabbed a part from the other room and hooked it up to the compressor. I never used that air tank so I can't really describe how that works. There's three different filling stations and the one in the back for the air tanks is completely different. I think there's CO2 and nitrogen in the front room, and in the back room is air. The tank that exploded was an air tank, not a chemical tank.

The fitting that Chris grabbed from the front room was a long piece of metal with a nozzle or a valve in the middle. The owner handed me the air tank to fill and Chris brought me to the back room to fill it. Chris hooked it up to the Poseidon and he went to fill it and nothing was happening. Chris went back to the front room and grabbed the long

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that I just described (FD)
metal piece with the valve, and hooked that up to it. I was like 2 or 3 feet away looking at the valve as he was filling it and I kept telling him it's not filling. To turn on the air, Chris did something on the Poseidon air tank. I think he turned a valve. To get the air in the cylinder, he had to push down on the valve on the top of the cylinder with a screwdriver and then turn the valve on the long metal piece to let the air in. There are three tanks on the Poseidon and Chris thought maybe one tank was empty and that's why it wasn't filling, so we tried another tank. I have no idea if Chris used the pressure regulator on the Poseidon system. He wasn't looking at that while we were filling, he was looking at the top of the cylinder and I was looking at the gauge and telling him it wasn't moving. Chris never mentioned that the pressure on the regulator needed to be set or mentioned the regulator at all. I don't know if the regulator was used. I think it was filled directly from the tank. Chris would throttle the air with the valve on the long metal piece and we would look at the gauge on the cylinder to see if it was full just like when we fill a fire extinguisher. I don't know the pressure we were filling to, I just looked at the gauge to see if it was full – red, green, you know. I would fill to the little white line between the green. We just knew that the pin wasn't moving at all. Chris used a screwdriver to press down on the top of the valve on the cylinder several times. No one had told me just how dangerous this operation was. There was no mention of anything in the back other than Chris would always tell me not to drop them as we moved them. That was the only warning I got about that.

On the day of the accident, we couldn't tell if there was air going into the cylinder. Normally when filling we can see the gauge moving and we should have been able to hear the steady flow of air into the tank when he cracked it but we didn't hear anything.

I haven't seen anyone other than Chris fill a cylinder from the Poseidon air tank. I have seen the owner and his son Robby fill cylinders from the CO2 line. I don't know why they need to fill with air verses CO2. I was only taught to do the fire extinguishers and I don't know anything about that stuff. That was the first morning he took any time to explain anything about air tanks and even that wasn't that good of a description. It was more like here's what you do and then we were concentrating on why isn't this getting air in it. I don't know if there was anything unusual about filling the tank because it was my first time and I have nothing to compare it to. The tank didn't make one bit of noise. We continued to fill it, and it exploded. In the explosion, you don't really hear anything, you just kind of go deaf like a buzz. And I thought the ground collapsed. I realized that I lost my leg. I crawled to the door and I was

screaming for Brian to come to call 911. And when he did, I took my belt off and I tourniqueted myself and I tried to get Chris to do the same thing. We just layed there until people started arriving. The first person that showed up was a firefighter and he wasn't trained to do anything so he couldn't do anything, and then two town cops showed up and they couldn't do anything, and then state troopers showed up and they started applying tourniquets and the paramedics got to Chris. We were brought in ambulances to a helicopter site. Chris went first and then I went. After the accident happened, Brian Scott didn't really show his face, either he was behind people looking in, or he wasn't really around at all. He came in, he looked at us and called 911 but then he wasn't really around after that. In the explosion, the shrapnel took both of Chris' legs, one of my legs, and hit other fire extinguishers which polluted the room with chemicals. You couldn't see anything and couldn't hear.

Statement (Affirmation)

I have read and had the opportunity to correct this statement consisting of 4 type-written pages, and these facts are true and correct to the best of my knowledge and belief. Public Law 91-596, Paragraph 17(g) makes it a criminal offense to knowingly make a false statement or misrepresentation in this statement.

Signature: <i>[Signature]</i>	
Date: 05/23/16	
Witness: <i>[Signature]</i> - Emily Fonseca	
Address 131 Hill Road	
City, State, ZIP Code Goshen, NY 10924	
Phone Number (845) 551-2130	

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